

The Honorable Robert J. Bryan

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,

NO. CR23-5034-02 RJB

Plaintiff

UNOPPOSED MOTION FOR PROTECTIVE ORDER

SAKIRU OLANREWAJU AMBALI,

NOTING DATE: August 21, 2023

Defendant.

The United States moves pursuant to Rule 16(d)(1) for a protective order prohibiting the dissemination or misuse of discovery material containing sensitive personal identifying information (PII) or financial information. Defense counsel has informed the undersigned that the defense agrees to entry of the proposed order.

The charges in this case involve allegations that the defendants used stolen PII and financial information to file thousands of fraudulent unemployment claims and tax returns using the identities of American residents. The discovery includes the PII or financial information of over 14,000 American residents that was recovered from email accounts alleged to be under the defendants' control. The United States seeks to produce this discovery to defense counsel without delay while protecting the sensitive information from disclosure.

Accordingly, the United States requests that the Court enter an order circumscribing the use of the PII and financial information contained in the discovery. The protective order would limit the defense's distribution of the material to those who need to review it to assist with the defense. The protective order also limits the defendant's access to material containing unredacted PII to BOP computers or to hard copies that may be reviewed only under supervision.

DATED: August 21, 2023

Respectfully submitted,

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